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11
12 **UNITED STATES DISTRICT COURT**

13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14
15 SHELDON LOCKETT,

16 Plaintiff,

17
18 v.

19 COUNTY OF LOS ANGELES, et al.,

20 Defendants.

Case No.: 2:18-cv-5838-DSF-JPR

21 } **DECLARATION OF STEVEN C.**
22 } **GLICKMAN IN SUPPORT OF**
23 } **MOTION *IN LIMINE* NUMBER 1**
24 } **TO EXCLUDE PREJUDICIAL**
25 } **EVIDENCE THAT IS**
26 } **INADMISSIBLE OR OTHERWISE**
27 } **SUBJECT TO EXCLUSION UNDER**
28 } **FEDERAL RULES OF EVIDENCE,**
RULES 402, 403, AND 404

*Filed concurrently with the Notice of
Motion and Memorandum of Points
and Authorities; lodged concurrently
with Proposed Order*

Pre-Trial Conference: Nov. 15, 2021
Time: 3:00 p.m.

Trial: December 14, 2021
Time: 8:30 a.m.

Judge: Hon. Dale S. Fischer
Courtroom: 7D
First Street Courthouse
350 West 1st Street
Los Angeles, CA

1 I, Steven C. Glickman, declare as follows:

2 1. I am an attorney admitted to the United States District Court for the
3 Central District of California, and duly licensed to practice law in California. I am a
4 principal at Glickman & Glickman, co-counsel of record for Plaintiff Sheldon Lockett.

5 2. I have personal knowledge of the facts set forth herein, except as to those
6 stated on information and belief, and as to those, I am informed and believe them to
7 be true. If called as a witness, I could and would testify to the contents of this
8 declaration.

9 3. I am informed and believe that each and every fact set forth in Plaintiff's
10 Motion *in Limine* Number 1 To Exclude Prejudicial Evidence That Is Inadmissible Or
11 Otherwise Subject To Exclusion Under Federal Rules Of Evidence, Rules 402, 403,
12 and 404 is true and correct and based on my review of the evidence as adduced during
13 discovery in this case.

14 4. Attached hereto as Exhibit 1 is a true and correct copy of pertinent
15 portions of Plaintiff Sheldon Lockett's deposition transcript, Volume II, at pages
16 376:21-386:2 and 390:21-392:24 [discussing his tattoos].

17 5. Attached hereto as Exhibit 2 is a true and correct copy of pertinent
18 portions of Defendant Aldama's deposition transcript, Volume I, page 122:20-23
19 [testifying that Mr. Lockett was wearing a gray sweater] and pages 150:11-151:1
20 [testifying he had never seen Plaintiff before they day of the incident, did not know
21 anything about him, and never knew if Plaintiff was on probation or parole].

22 6. Attached hereto as Exhibit 3 is a true and correct screen shot from a
23 video (identified as Exhibit 164 for trial) taken after Mr. Lockett was arrested showing
24 him wearing a long sleeve gray top, so that tattoos are not visible.

25 7. Plaintiff met and conferred with opposing counsel pursuant to Local
26 Rules 7-3 and 16-2 via a Zoom video conference on October 20, 2021 following
27 Plaintiff's letter of October 15, 2021 setting forth the grounds for Plaintiff's
28 anticipated motions *in limine*. The parties were unable to reach an agreement and,

1 accordingly, Plaintiff now brings this motion.

2 I declare under penalty of perjury under the laws of the United States of
3 America and the State of California that the foregoing is true and correct.

4 Executed this 26th day of October 2021, at Sherman Oaks, California.

5

6

By /s/ Steven C. Glickman
Steven C. Glickman

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EXHIBIT 1

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHELDON LOCKETT,

Plaintiff,

vs.

CASE NO. 2:18-cv-05838-PJW

COUNTY OF LOS ANGELES, a
public entity; LOS ANGELES COUNTY
SHERIFF'S DEPARTMENT; a law
enforcement agency; former SHERIFF
JIM MCDONNELL; MIZRAIN
ORREGO, a Deputy Los Angeles
County Sheriff; SAMUEL ALDAMA; a
Deputy Los Angeles County Sheriff;
and DOES 1 through 100, inclusive,

Defendants.

ORIGINAL

**DEPOSITION OF
SHELDON LOCKETT
VOLUME 2**

DATE: December 16, 2019

REPORTER: Willie Anderson

LOCATION: 255 East Temple Street
Courtroom 790
Los Angeles, California 90012



HINES REPORTERS

INTERNATIONAL TOWER
888 S. FIGUEROA STREET, SUITE 940, LOS ANGELES, CALIFORNIA 90017
866.432.4300

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1 Q. Okay. So you don't recall her last name?

2 A. No. I just say Dr. Michelle, you know, any time

3 I, you know, greet her.

4 Q. Okay. And have you ever been to her office?

5 A. No.

02:32:08PM

6 Q. Okay. Has she charged you any fees for her
7 services?

8 A. No.

9 Q. Do you know how much she's charging for her
10 services?

02:32:23PM

11 A. No.

12 Q. Do you remember what the arrangements are to pay
13 her for her services?

14 A. No.

15 Q. Have you incurred any medical expenses in
16 connection with this case, to date?

02:32:28PM

17 A. No.

18 MR. SWEENEY: Well, withdrawn.

19 I am going to interpose an objection. It calls
20 for speculation.

02:33:03PM

21 MR. IVIE: Mr. Lockett, can you look at the

22 Exhibits -- Exhibit 22, which I just handed to your

23 counsel. I'm gonna start with Exhibit 22-1.

24 (Defendant's Exhibit 22-1 & 22-2 were

25 marked for identification by the Court

Lockett vs. COLA

Deposition of Sheldon Lockett, Vol. 2

1 Reporter, and a copy is attached hereto.)

2 BY MR. IVIE:

3 Q. Can you describe 22-1 for the record, please.

4 Just describe it for me. I know it's a photograph of

5 you --

02:33:47PM

6 A. Oh, oh.

7 Q. -- but the record doesn't -- won't reflect that,

8 so you'll need to describe it for the record.

9 A. It's a picture of me, Sheldon Lockett, standing

10 with my shirt off.

02:33:55PM

11 Q. Okay. Yeah. That -- that's it.

12 A. Oh, Okay.

13 Q. All right.

14 And on your torso, you have tattoos on your

15 torso?

02:34:09PM

16 A. Yes.

17 Q. Okay. And I think we have, just for purposes of

18 this Exhibit, 22-1, can you tell me how many tattoos are

19 shown on your torso and -- your arms and your torso?

20 You can just count. You can count them to

02:34:30PM

21 yourself and then tell me.

22 A. Twelve.

23 Q. "Twelve"? Okay. So -- and I think you have, in

24 the next several series of photographs, they're

25 close-ups of each one of those; is that right? Why

02:34:45PM

1 don't you just flip through them real quick.

2 A. Oh, okay.

3 MR. SWEENEY: Just go --

4 THE WITNESS: All right. Yes.

5 BY MR. IVIE: 02:35:05PM

6 Q. Okay. All right. So let's go to the next in

7 order 22-2, and this -- this photograph features your

8 right arm; is that right?

9 A. Yes.

10 Q. Okay. So why don't we start with your right 02:35:27PM

11 hand, and we'll just mark that one as No. 1. I'm just

12 putting it in the order that the photos are in. They --

13 the numbers have no importance.

14 A. Okay.

15 Q. Okay? Only that we'll be able to follow it 02:35:39PM

16 and -- and know what we're talking about; okay?

17 A. I understand.

18 Q. All right. So this is your right hand that's

19 featured prominently in this photograph; correct?

20 A. Yes. 02:35:52PM

21 Q. So let's just start with your right hand, and

22 tell me what's on your right hand. We'll call that

23 photo No. 1; okay? That's the right hand.

24 A. On my right hand there's "Yours," the word

25 "Yours," and there's a mask and bricks and shading -- 02:36:06PM

Lockett vs. COLA

Deposition of Sheldon Lockett, Vol. 2

1 brick walls, a mask and the word "Yours."

2 Q. What does that mean?

3 A. Which part? Which? Which?

4 Q. Just -- just describe what --

5 A. Um --

6 Q. -- tell me.

7 Are they all connected, or are they all

8 separate?

9 A. -- well, the hand tattoo is connected to my

10 other hand, so it's, kind of, like you got to put my 02:36:29PM

11 hands together --

12 Q. Oh,

13 A. -- to make it make sense.

14 Q. I see. Okay. All right.

15 So this is a tattoo that's -- what does it mean? 02:36:35PM

16 We'll get to your other hand, but what does that mean?

17 What does it symbolize?

18 A. The word "Yours" and on the other side is

19 "Truly." So Yours Truly, it symbolizes just me saying,

20 this is Sheldon.

21 This is -- Yours Truly is just me saying this is

22 Sheldon Lockett, and, uh, the -- the -- the masks are

23 just something I thought was cool, like a mask --

24 Q. Okay.

25 A. -- like a clown mask. 02:36:58PM

1 And, um --

2 Q. All right.

3 A. -- the bricks are just shading behind it. It

4 was just filling in the -- because it feels -- it was

5 pretty empty at first. 02:37:05PM

6 And I always though just having a hand tattoo

7 was cool, and that's -- that's pretty much it.

8 Q. Okay. All right. And let's -- let's just go up

9 your arm. We'll get to 12 in a moment, by the time

10 we're done. 02:37:20PM

11 A. Okay.

12 Q. All right. So is the next one the picture of

13 the -- the -- I don't know who that is, necessarily.

14 A. Um, my -- it was supposed to be, uh, Jesus --

15 Q. Okay. 02:37:30PM

16 A. -- a Jesus portrait.

17 Q. It kind of looked like that, but I didn't want

18 to be presumptuous.

19 A. Oh, okay.

20 Q. All right. 02:37:39PM

21 So this is just a picture of Jesus?

22 A. Yes.

23 Q. All right.

24 And that symbolizes what to you?

25 A. Just godliness. You know, just -- just my 02:37:44PM

1 belief, my spiritual interest, my spiritual beliefs, not
2 necessarily on -- maybe it could have looked different,
3 but it was just, uh, from my spiritual knowing that I'm
4 protected.

5 Q. Okay. All right. 02:37:56PM

6 And then the words above it, is that connected
7 with the picture, or is that separate?

8 A. No. That's separate. That's my mom's name at
9 the top. It says "Michelle."

10 Q. All right.

11 A. My dad's name "Darryl," in the middle, and then
12 that's my name at the bottom of the third name, and that
13 was just my first tattoo I ever got.

14 Q. Oh, okay.

15 So that would be tattoo No. 3? 02:38:19PM

16 A. Yes.

17 Q. Okay. And then the next -- it looks like a bird
18 or something.

19 A. Yeah. It's like a -- they were supposed to be
20 doves -- 02:38:30PM

21 Q. Uh-huh.

22 A. -- just -- you know, just filling in the space
23 going in with the -- kind of was going with the theme --
24 with a theme, kind of, art there, like, spiritual and
25 doves then my family name. 02:38:40PM

1 And then, you know, behind this arm, I have a
2 prayer hands for my grandfather that passed. Those kind
3 of was all like a little theme just for my family and
4 kind of the things I care about.

5 Q. Okay. And then we'll go up the arm, No. 5 is 02:38:52PM
6 what?

7 A. That says "Aunie." It's just the way that I
8 call my aunt. I don't say "aunt" or "auntie" so I came
9 up with Aunie.

10 So I just -- you know, and then I just put the 02:39:03PM
11 stars around it to make it -- I don't know. I thought
12 it was cool.

13 Q. Okay. All right. And then there's one more
14 featured here on your abdomen.

15 What is that? 02:39:15PM

16 A. Oh, that's a -- just Japanese or Chinese
17 letters. I don't really know, but they were supposed to
18 mean courage. I mean, I don't -- I don't really know if
19 I was correct when I picked them out.

20 Q. Okay. All right. 02:39:29PM

21 MR. SWEENEY: They were supposed to be what?

22 THE WITNESS: Courage, but I don't if I was --

23 BY MR. IVIE:

24 Q. Let's go to -- let's go to the other photograph.

25 Did I miss any? Well, I see your -- your -- 02:39:35PM

1 your left arm, but we're going to get to a photograph of

2 your left arm, so I won't ask you about that now.

3 A. Okay.

4 Q. Okay? But have we missed any others that

5 were featured here in Photograph 22-2? Did we talk 02:39:50PM

6 about all of them? I've counted six.

7 A. It's -- it's one right in the inside of my -- my

8 right arm here. You can kind of see it a little bit on

9 them pictures. It's kind of --

10 Q. Oh yeah. 02:40:03PM

11 A. -- wrapping around a little bit --

12 Q. Oh, yeah.

13 A. -- but that just says the word "Love."

14 Q. Okay. We'll make that seven, but I think we'll

15 have another view of that on another picture. 02:40:10PM

16 MR. IVIE: Okay. So let's go to the next photo,

17 which is 22-3.

18 (Defendant's Exhibit 22-3 was marked for

19 identification by the Court Reporter,

20 and a copy is attached hereto.)

21 BY MR. IVIE:

22 Q. And that's your left arm?

23 A. Yes.

24 Q. Okay. And what is this?

25 A. Ah, flames and a skull head, and the Los Angeles 02:40:24PM

1 logo. You know, I was born in Los Angeles, so I just

2 thought why not get the logo.

3 And that flames was just trying to add some

4 flavor to the tattoo, and -- and -- and the skull was

5 just something I always, kind of, thought, was, you 02:40:41PM

6 know, cool.

7 And in my generation people just, you know, wear

8 skulls and wear skull clothes and skull belts, and it's

9 nothing -- not nothing serious, just thought it was a

10 cool thing to do. 02:40:55PM

11 Q. Okay. And, uh, where's the logo L.A.? Where is

12 that at?

13 A. Um, it's right next to the skull. It's like

14 next to --

15 Q. Oh, I see it. I see it. Yeah. Just to the -- 02:41:04PM

16 I guess to the right of the skull.

17 A. Yes.

18 Q. Okay. And what's on your hand?

19 A. Um, that's "Truly" on that side which goes along

20 with the "Yours" on the other side, and the same but 02:41:19PM

21 another mask, another, you know, face, and the same

22 shading and the same bricks as the -- as the other

23 opposite hand.

24 Q. I see. Okay. So I think we'll have a better

25 view of that in a later photograph. 02:41:38PM

1 I'm gonna just stop with the skull, and I'll
2 mark that skull as No. 8.

3 A. Okay.

4 MR. IVIE: Okay? All right. So then let's go
5 over to the next, and that is Photograph 2-4 [sic]. 02:41:48PM
6 We'll make this No. 9.

7 (Defendant's Exhibit 22-4 was marked for
8 identification by the Court Reporter,
9 and a copy is attached hereto.)

10 BY MR. IVIE:

11 Q. What does that say?

12 A. It says "Cairo" with a footprint. My aunt -- my
13 Aunie, you know, that I just explained to you, she had
14 a -- you know, a son.

15 It's basically, like, my -- my little cousin, 02:42:11PM
16 but, you know, my aunt never had kids, and she had him
17 around the time I, probably, was around 20, 21, maybe,
18 or 19, maybe 20.

19 But, um, I just was showing my -- showing my
20 support and my love for, you know, my aunt having a kid. 02:42:24PM
21 I kind of look at him more like my little brother than
22 my little cousin.

23 And my aunt -- my Aunie she raised me, took me
24 to get haircuts, and we got a real good, you know,
25 relationship. She did a lot for me. 02:42:41PM

1 So, you know, I just felt connected to her
2 having her first kid, and she was, you know, over 40.

3 Q. Um, okay. And let me ask you this: These two
4 marks on your right shoulder, are these from the Taser?

5 A. Honestly, I -- I don't think the two at the top 02:43:00PM
6 are, but a little bit further down, as far as -- a
7 little bit further down, there's a few, like, lighter
8 marks that -- those -- those -- that's what those are,
9 but those two at the top aren't.

10 These two aren't (indicating). I know what he's 02:43:13PM
11 talking about these two aren't.

12 MR. SWEENEY: Are not?

13 BY MR. IVIE:

14 Q. Okay. Do me --

15 THE WITNESS: Not --

16 BY MR. IVIE:

17 Q. -- do me a favor --

18 THE WITNESS: -- these two (indicating).

19 MR. SWEENEY: Which?

20 BY MR. IVIE:

21 Q. -- can you take a

22 THE WITNESS: Like, down here (indicating).

23 BY MR. IVIE:

24 Q. -- pen --

25 THE WITNESS: Like, these little --

1 MR. SWEENEY: -- probes.

2 MR. IVIE: I'm just saying that's his testimony.

3 MR. SWEENEY: Yeah, I know, "Taser probes."

4 MR. IVIE: "Probes."

5 MR. SWEENEY: I'll stipulate to "probes." 02:47:17PM

6 MR. IVIE: All right. So stipulated.

7 BY MR. IVIE:

8 Q. So you've -- you felt a total of four Taser
9 probes strike your back; is that right?

10 A. Um, I'm not going to say I felt a total of four. 02:47:41PM

11 Q. Okay. But you believe four Taser probes struck
12 your back?

13 A. Four -- four or more. Like I said in the
14 beginning, four or five.

15 MR. IVIE: I see. Okay. All right. So let's 02:47:58PM
16 go to Exhibit 22-5.

17 (Defendant's Exhibit 22-5 was marked for
18 identification by the Court Reporter,
19 and a copy is attached hereto.)

20 BY MR. IVIE:

21 Q. And can you describe the three photographs that
22 we have -- three tattoos, rather, that we haven't talked
23 about that are shown in this photograph?

24 A. Excuse me. Excuse me, but the -- the chest --
25 it's right here -- right here on the chest, right above 02:48:36PM

1 the nipple is a Shoepa.

2 That's says Shoepa, but that's what I call my

3 grandma since I was a kid. I wouldn't say grannie or

4 grandma. I wouldn't say nana, and I've been -- that's

5 the name that I give her. 02:48:52PM

6 My whole family calls my Shoepa, Shoepa now.

7 MR. IVIE: Okay.

8 (Defendant's Exhibit 22-6 was marked for

9 identification by the Court Reporter,

10 and a copy is attached hereto.)

11 THE WITNESS: And the top is "Chosen One." I'm

12 a fan of Lebron James, so when I got that tat, I just,

13 you know, copied Lebron James, like, when he first

14 entered the NBA, the Chosen One.

15 And the Chanelle is for my girlfriend. I got 02:49:09PM

16 that logo for my girlfriend Chanel Reynolds. This was

17 in 2009, maybe, when I got that tattoo, and it was just

18 to symbolize for her and her name.

19 BY MR. IVIE:

20 Q. All right. Okay. And 22-6 we've talked about, 02:49:25PM

21 and then 22-7 is the two arms together; right?

22 A. Yes.

23 (Defendant's Exhibit 22-7 was marked for

24 identification by the Court Reporter,

25 and a copy is attached hereto.)

1 BY MR. IVIE:

2 Q. And then let's go back to 22-1, and I think we
3 missed -- we -- we did not discuss the tattoo in your --
4 shown on your left shoulder; correct?

5 A. Oh, yeah. That's a world industry logo. It's a 02:50:27PM
6 skateboard logo. They have a -- they have a -- that's,
7 basically, like a rain drop.

8 They have a -- a -- that's actually the flame.
9 That's the flame one. They have a rain drop. They have

10 a ice cube. It's about four different World Industry 02:50:43PM
11 logos.

12 That's just a skateboard logo. I thought it was
13 cool. I'm from Los Angeles. You know, people ride
14 skateboards here and stuff like that.

15 Q. Okay. Do you ride skateboards? 02:50:56PM

16 A. Yeah. I used to when I was younger.

17 Q. Okay. And then what's that name right above
18 that, right by your clavicle, collarbone, rather?

19 A. Oh, that's the Chanel logo or the Chosen One?

20 Q. Oh, okay. It says "Chosen" on -- on the right, 02:51:12PM
21 and --

22 A. And One --

23 Q. -- "One" on the left?

24 A. Yeah.

25 Q. I see. Okay. Oh, can we go back to -- to the 02:51:16PM

EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SHELDON LOCKETT,)
) CASE NO.
) 2:18-CV-5838-PJW
PLAINTIFF,)
)
VS.)
)
COUNTY OF LOS ANGELES, A PUBLIC)
ENTITY; LOS ANGELES COUNTY)
SHERIFF'S DEPARTMENT, A LAW)
ENFORCEMENT AGENCY; SHERIFF)
JIM MCDONNELL; MIZRAIN ORREGO, A)
DEPUTY LOS ANGELES COUNTY SHERIFF;)
SAMUEL ALDAMA, A DEPUTY)
LOS ANGELES COUNTY SHERIFF; AND)
DOES 1 THROUGH 100, INCLUSIVE,)
_____)

PORTIONS OF THIS TRANSCRIPT ARE CONFIDENTIAL

VIDEOTAPED DEPOSITION OF DEPUTY SAMUEL ALDAMA

LOS ANGELES, CALIFORNIA

THURSDAY, DECEMBER 19, 2019

VOLUME I

JOB NO. 3815413

REPORTED BY: VICTORIA I. WERTZ, RPR, CSR NO. 7999

PAGES 1-162

PAGES 39 - 103 ARE CONFIDENTIAL AND ARE BOUND SEPARATELY

Page 1

1 Q Okay. 04:17:03
2 Male black, gray sweater. 04:17:08
3 Did you see a silver or gray Pontiac 04:17:11
4 parked by him? 04:17:14
5 A No. 04:17:15
6 Q Did you see a blue beanie? 04:17:16
7 A No. 04:17:21
8 Q So the two factors that led you to believe 04:17:31
9 this might be a suspect is the fact that he was 04:17:36
10 black, number one, and number two, he had on a gray 04:17:39
11 top; is that correct? 04:17:45
12 A I believe it was a gray sweater. 04:17:47
13 Q Okay. 04:17:51
14 Describe the gray sweater? 04:17:57
15 A Sir, this case is from 2016. It's a gray 04:17:59
16 sweater. That's all I can recall. 04:18:04
17 Q I have a sweater that is made of cashmere. 04:18:07
18 A cardigan style is just buttons towards the 04:18:13
19 bottom. 04:18:16
20 Can you describe the sweater that you saw 04:18:19
21 out there that day on the suspect? 04:18:23
22 A Like I said, sir, that case from 2016, all 04:18:28
23 I can remember is a gray sweater. 04:18:32
24 Q Okay. 04:18:34
25 So that's why you decide to approach 04:18:35

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1 BY MR. SWEENEY: 04:51:07

2 Q How long did it take to come up with this 04:51:07

3 plan? 04:51:09

4 A Seconds. 04:51:10

5 Q Okay. 04:51:11

6 Who held the gun on Mr. Lockett while you 04:51:12

7 formulated this plan? 04:51:16

8 A Me. 04:51:18

9 Q I'm sorry? 04:51:21

10 A Myself. 04:51:23

11 Q From the time you first approached Lockett 04:51:49

12 in that courtyard -- sorry. Sorry -- on Spruce, 04:51:51

13 until the time he was on the ground, you did not 04:51:57

14 know whether or not he was on probation or parole; 04:52:01

15 isn't that correct? 04:52:10

16 A Correct. 04:52:10

17 Q Had you ever seen Mr. Lockett before in 04:52:15

18 your life -- before this day? 04:52:17

19 A You are talking about the incident date? 04:52:21

20 Q Yes. 04:52:23

21 A No. 04:52:24

22 Q You didn't know anything about him, 04:52:25

23 correct? 04:52:27

24 A No. 04:52:28

25 Q Am I correct? 04:52:28

1 A Correct. 04:52:31

2 Q All right. 04:52:32

3 Who was the first deputy who put their 04:52:43

4 hands on Mr. Lockett? 04:52:47

5 A I don't recall who was the first deputy, 04:52:52

6 but I was in the courtyard. 04:52:56

7 Q Okay. 04:53:00

8 That day, you put your hands on 04:53:02

9 Mr. Lockett; isn't that true? 04:53:04

10 A I made contact with Mr. Lockett in the 04:53:05

11 courtyard. 04:53:08

12 Q Okay. 04:53:08

13 Did you strike him with your fists? 04:53:12

14 A Once he was on the ground, yes. 04:53:16

15 Q After Mr. Lockett was standing in a 04:53:24

16 surrendered position, on his knees, hands up, did 04:53:30

17 you give any more commands? 04:53:34

18 A No. 04:53:37

19 Q Did anyone else give any more commands 04:53:38

20 that you heard? 04:53:40

21 A Not that I heard. 04:53:41

22 Q At some point, did Mr. Lockett prone 04:53:45

23 himself on the ground? 04:53:48

24 Do you know what I mean by "prone"? Face 04:53:51

25 down. 04:53:53

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EXHIBIT 3

